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Attorney for Debtor

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IN RE:

**DAVID CULAR**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
CHAPTER 13  
CASE NO.: 18-21229/KCF

DEBTORS

**NOTICE OF MOTION FOR ORDER ALLOWING  
THE SALE OF REAL PROPERTY**

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HEARING DATE: July 25, 2018 at 9:00 AM

ORAL ARGUMENT WAIVED

TO: 1. UNITED STATES BANKRUPTCY COURT  
2. ALBERT RUSSO, TRUSTEE  
3. SECURED CREDITORS

**PLEASE TAKE NOTICE** that the undersigned attorney for the Debtors shall  
move for the following relief:

**FOR AN ORDER ALLOWING THE SALE OF REAL PROPERTY**

Pursuant to Local Rule 9013-1(b), the motion is returnable before the Honorable  
Kathryn C Ferguson, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey  
08608 and will be heard on the date and time as listed in the caption or as soon thereafter as  
counsel may be heard.

Pursuant to Local Rule 9013-1(i), Fed. R. Bankr. P. 9017 and Fed. R. Civ. P.  
37(e), the undersigned will rely on the certification submitted in support of this motion.

**STATEMENT OF NON-NECESSITY OF BRIEF:** The movant certifies,

pursuant to Local Rule 9013-2, that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

Pursuant to Local Rule 9013-3 and 9072-1, a Certificate of Service and proposed form of order is annexed.

Pursuant to Local Rule 9013-1(d), all answering papers and cross-motions shall be filed and served at least seven days before the return date of this motion. If you wish to contest this motion, you must file with the office of the clerk of the United States Bankruptcy Court responding papers stating with particularity the basis of your opposition to the within motion.

You must also mail a copy of your opposition to:

JAMES J. CERBONE, P.C.

DATED:

/ s / James J. Cerbone, Esquire  
JAMES J. CERBONE, ESQUIRE